

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNIVERSAL PROPERTY  
SERVICES INC., and  
SYED KAZMI

Plaintiffs,

vs.

LEHIGH GAS WHOLESALE  
SERVICES, INC., *et al.*

Defendants.

Civil Action No. 3:20-cv-03315-FLW-TJB

**STIPULATION AND ~~PROPOSED~~  
CONSENT ORDER REGARDING  
PLAINTIFFS' SUPPLEMENTATION  
OF INTERROGATORY RESPONSES  
AND DOCUMENT PRODUCTION**

**THIS MATTER** was opened to the Court via a stipulation and proposed consent order to resolve certain outstanding discovery disputes between Plaintiffs Universal Property Services Inc. and Syed Kazmi ("Plaintiffs") and Defendants Circle K Stores Inc. ("Circle K") and TMC Franchise Corp. ("TMC") arising out of Plaintiffs' responses to Circle K's and TMC's written discovery requests; and

**WHEREAS**, counsel for Plaintiffs and counsel for Circle K and TMC have met and conferred on multiple occasions regarding the discovery disputes, and Plaintiffs have agreed to supplement their interrogatory responses and supplement their document production by a date certain in the manner more fully described below; and

**WHEREAS**, the parties have stipulated to the entry of this Order in order to resolve their disputes; and

**WHEREAS**, in view of the foregoing, and other good cause appearing and having been shown,

**IT IS HEREBY ORDERED** that:

1. By no later than October 10, 2022, Plaintiffs shall supplement their interrogatory responses to Circle K's and TMC's Interrogatories No. 5 with any responsive information available to Plaintiffs.


2. By no later than October 10, 2022, Plaintiffs shall supplement their interrogatory responses to Circle K's Interrogatory No. 11 and TMC's Interrogatory No. 6 with any responsive information available to Plaintiffs.

3. By no later than October 10, 2022, Plaintiffs shall conduct a reasonable search for and produce all documents in their custody, possession, and control responsive to Circle K's Requests Nos. 3, 6 and 13 and TMC's Requests Nos. 2 and 3.

4. By no later than October 10, 2022, Plaintiffs shall produce documents in response to Circle K's and TMC's Requests for Production that fully comply with the parties' agreed-upon ESI Protocol. *See* Dkt. # 101.

5. If Plaintiffs fail to supplement and cure their discovery responses as set forth herein, Circle K and TMC shall be permitted to move to compel such responses and to seek appropriate sanctions against Plaintiffs without having to further meet and confer with Plaintiffs or to seek further leave from the Court.

**IT IS SO ORDERED** on this 11 day of October 2022.

  
\_\_\_\_\_  
Hon. Tonia V. Bongiovanni, U.S.M.J.

The undersigned parties hereby stipulate to the Court's entry of this form of Order.

**ZARCO EINHORN SALKOWSKI, P.A.**

By: /s/ Robert Salkowski  
Robert Zarco, Esq, (*pro hac vice*)  
Robert Salkowski, Esq. (*pro hac vice*) (NJ Bar No: 049591992)  
One Biscayne Tower  
2 South Biscayne Boulevard  
34th Floor  
Miami, FL 33131  
(305) 374-5418  
RSalkowski@ZarcoLaw.com

*Attorneys for Plaintiffs Universal Property Services Inc. and Syed Kazmi*

**FAEGRE DRINKER BIDDLE &  
REATH LLP**

By: /s/ Matthew J. Fedor  
Matthew J. Fedor, Esq.  
Alison E. Thompson, Esq.  
600 Campus Drive  
Florham Park, NJ 07932  
(973) 549-7000  
Matthew.Fedor@faegredrinker.com  
Alison.Thompson@faegredrinker.com

Kerry L. Bundy, Esq. (*pro hac vice*)  
Joshua N. Turner, Esq. (*pro hac vice*)  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
(612) 766-7000  
Kerry.Bundy@faegredrinker.com  
Josh.Turner@faegredrinker.com

*Attorneys for Defendants Circle K Stores Inc. and TMC Franchise Corp.*